

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JULIAN M. KNIGHT and
ANSHUMAN CHANDRA,

Plaintiffs,

v.

STANDARD CHARTERED BANK,
STANDARD CHARTERED BANK, DUBAI,
and STANDARD CHARTERED BANK, NEW
YORK,

Defendants.

19-cv-11739 (PAE)
[rel. 18-cv-11117 (PAE)]

**DECLARATION OF
AMANDA MELLOR IN
SUPPORT OF MOTION TO
DISMISS**

Amanda Mellor declares under penalty of perjury under the laws of the United States of America, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am Company Secretary for Standard Chartered PLC, the ultimate corporate parent of Standard Chartered Bank (“SCB” or the “Bank”). I am authorized in that capacity to make this declaration on behalf of SCB. I know the facts set forth herein from my own personal knowledge or because I made appropriate inquiries of others to inform myself in order to make this declaration. All of the facts herein are true and correct to the best of my knowledge. I can and will testify to this information if called as a witness.

2. I submit this declaration in support of Defendants’ Motion to Dismiss the Complaint filed by Plaintiffs Anshuman Chandra and Julian M. Knight on December 23, 2019.

3. In my position as Company Secretary, I am knowledgeable about the organizational structure of SCB. Understanding the structure of SCB is part of my responsibilities in this role.

4. SCB is a bank incorporated under the laws of England and Wales with limited

liability by Royal Charter. A true and correct copy of the Royal Charter, Bye-Laws, and Rules of SCB is attached hereto as Exhibit A.

5. SCB is headquartered in England and maintains its principal place of business there. Its principal office is located at 1 Basinghall Avenue, London, EC2V 5DD, England.

6. SCB has branch locations around the world. One of SCB's branch locations is in New York, located at 1095 Avenue of the Americas, New York, NY 10036 (the "New York Branch"). The New York Branch is not SCB's headquarters nor its principal place of business. The New York Branch is not separately incorporated in New York. SCB has no other branches in the State of New York.


7. SCB has two branch locations in Dubai. SCB's Dubai branch is located at Tower Downtown Dubai, P.O. Box 999 Dubai, United Arab Emirates (the "Dubai Branch"). The Dubai Branch is not SCB's headquarters nor its principal place of business. The Dubai Branch is not separately incorporated in Dubai.

8. SCB's Dubai International Financial Centre Branch is located at Unit 301, Level 3, Gate Precinct Building 1, Dubai International Financial Centre, Dubai, 999, United Arab Emirates (the "DIFC Branch"). The DIFC Branch is not SCB's headquarters nor its principal place of business. The DIFC Branch is also not separately incorporated in Dubai.

* * *

9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: London, United Kingdom
April 29, 2020


Amanda Mellor